

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA
CIVIL ACTION NO. 1:17-CV-384

CHERIE NOELLE MANESS,)
)
Plaintiff,)
)
vs.)
)
CITY OF HIGH POINT, NORTH)
CAROLINA,)
)
Defendant.)
)

**PLAINTIFF'S RESPONSE TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and LR 56.1, plaintiff hereby responds to Defendant's Motion for Summary Judgment. Based on the pleadings, exhibits and depositions filed in support of this response, and for the reasons stated in plaintiff's accompanying Memorandum of Law, plaintiff contends that there are genuine issues of material fact concerning each element of plaintiff's claims, and that defendant is not entitled to judgment as a matter of law.

WHEREFORE, plaintiff respectfully requests that this Court deny Defendant's Motion for Summary Judgment. Pursuant to LR 7.3 (c)(1), plaintiff respectfully requests oral argument if the Court deems it appropriate and helpful.

This the 5th day of September, 2018.

/s/Robert M. Elliot
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CERTIFICATE OF SERVICE

I hereby certify that on September 5, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

Elliot Morgan Parsonage, PLLC

/s/Robert M. Elliot

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